

UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF WISCONSIN

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**VIRGINIA WOLF, et al.,**

Plaintiffs,

vs.

Case No.: 14-cv-64-BBC

**SCOTT WALKER, et al.,**

Defendants.

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**PLAINTIFFS' MOTION FOR AN AWARD OF  
ATTORNEYS' FEES, COSTS AND EXPENSES**

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The plaintiffs, by their undersigned attorneys, hereby move for an award of attorneys' fees, costs and expenses pursuant to the Civil Rights Attorneys' Fees Awards Act of 1976, 42 U.S.C. § 1988.

As set forth more fully in their brief in support of this motion, their bill of costs, and the declarations of John A. Knight, Laurence J. Dupuis, James D. Esseks, Marc R. Kadish, Gretchen E. Helfrich, Jeff Scott Olson, Michael R. Fox, and Anne L. Clark, plaintiffs request an award of \$1,237,623.00 in attorney's fees and \$6,181.83 in out-of-pocket expenses.<sup>1</sup> The brief, declarations and supporting documents demonstrate that: (1) plaintiffs are "prevailing parties" within the meaning of 42 U.S.C. § 1988, and thus are entitled to an award of costs and expenses, including a reasonable attorney's fee; (2) counsel reasonably and necessarily spent the hours claimed in the litigation of this case;

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<sup>1</sup> Plaintiffs are also submitting a separate Bill of Costs seeking \$3,099.95 in costs.

(3) the hourly rates of counsel are reasonable; and (4) the claimed costs and expenses were reasonably and necessarily incurred in the litigation of this case.

WHEREFORE, plaintiffs respectfully request that this motion be granted and that the Court enter an order awarding the plaintiffs the sum of \$1,243,804.83 in attorneys' fees, costs and expenses.

Dated this 12th day of December, 2014.

/s John A. Knight

JOHN A. KNIGHT

American Civil Liberties Union  
Foundation

Lesbian Gay Bisexual Transgender Project  
180 North Michigan Ave., Ste. 2300  
Chicago, IL 60601  
(312) 201-9740  
jaknight@aclu.org

LAURENCE J. DUPUIS

American Civil Liberties Union of  
Wisconsin Foundation  
207 E. Buffalo St., Ste. 325  
Milwaukee, WI 53202  
(414) 272-4032  
ldupuis@aclu-wi.org

JAMES D. ESSEKS

American Civil Liberties Union  
Foundation

Lesbian Gay Bisexual Transgender Project  
125 Broad Street  
New York, NY 10004  
(212) 549-2623  
jesseks@aclu.org

HANS J. GERMANN

FRANK DICKERSON

Mayer Brown LLP  
71 S. Wacker Dr.  
Chicago, IL 60606  
(312) 782-0600  
hgermann@mayerbrown.com  
fdickerson@mayerbrown.com

Gretchen Helfrich

Loevy & Loevy

312 North May Street  
Chicago, IL 60607  
gretchenh@loevy.com

*Attorneys for Plaintiffs*